Mr. Rick Monroe
Support Terminal Services, Inc.
P. O. Box 34132
Indianapolis, IN 46234-0132

Re: 063-16459-00027
Third Administrative Amendment to
FESOP 063-9219-00027

Dear Mr. Monroe:

Support Terminal Services, Inc. located at 3350 and 3218 North Raceway Road, Indianapolis, Indiana was issued a FESOP on October 7, 1998 for a gasoline storage terminal. A letter requesting a change in the FESOP was received on August 12, 2002. The change involves the inclusion in the FESOP of an existing unpermitted storage tank which emits 0.55 tons of VOC per year (see the attached spreadsheets). It qualifies as a "revision to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term, and it will comply with the same applicable requirements as the existing storage tanks" under 326 IAC 2-8-10, administrative amendment. This tank predates the New Source Performance Standards, Subparts K, Ka and Kb. Therefore, the permit is hereby administratively amended to add the following storage tank as follows (changes are **bolded** and deletions are ~~struck-through~~ for emphasis):

(a) One (1) internal floating roof storage tank, identified as Tank 201 with a capacity of 84,000 gallons. This tank is currently not being used and was constructed before 1973.

(1) Section A.2 Emission Units and Pollution Control Equipment Summary will be amended as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(1) through (19) no change

(20) One (1) raffinate internal floating roof storage tank, identified as Tank 201 with a capacity of 84,000 gallons. This tank is currently not being used and was constructed before 1973.

(2) The above change will also be reflected in Section D.1 as follows:

Facility Description [326 IAC 2-8-4(10)]

(1) One (1) gasoline storage tank, constructed in 1953, identified as 2001, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2001.
(2) One (1) gasoline storage tank, constructed in 1953, identified as 2002, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2002.
(3) One (1) gasoline storage tank, constructed in 1953, identified as 2003, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2003.
(4) One (1) gasoline storage tank, constructed in 1953, identified as 2004, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2004.
(5) One (1) gasoline storage tank, constructed in 1953, identified as 4001, with an internal floating roof, with a maximum capacity of 1,680,000 gallons, and exhausting to vent 4001.
(6) One (1) gasoline storage tank, constructed in 1953, identified as 4002, with an internal floating roof, with a maximum capacity of 1,680,000 gallons, and exhausting to vent 4002.
(7) One (1) gasoline storage tank, constructed in 1953, identified as 4003, with an internal floating roof, with a maximum capacity of 1,680,000 gallons, and exhausting to vent 4003.
(8) One (1) truck loading rack, identified as NA01, with a maximum capacity of 80,000 gallons per hour, with VOC emissions controlled by a vapor combustor (constructed 1988), and exhausting to vent NA01.
(9) One (1) diesel storage tank, constructed in 1953, identified as 1003, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1003.
(10) One (1) diesel storage tank, constructed in 1953, identified as 1005, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1005.
(11) One (1) diesel storage tank, constructed in 1953, identified as 1006, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1006.
(12) One (1) diesel storage tank, constructed in 1953, identified as 2006, with an internal floating roof, with a maximum capacity of 853,020 gallons, and exhausting to vent 2006.
(13) One (1) diesel storage tank, constructed in 1953, identified as 2401, with an internal floating roof, with a maximum capacity of 1,015,182 gallons, and exhausting to vent 2401.
(14) One (1) diesel storage tank, constructed in 1953, identified as 3001, with a vertical fixed roof, with a maximum capacity of 1,353,196 gallons, and exhausting to vent 3001.
(15) One (1) diesel storage tank, constructed in 1953, identified as 5501, with a vertical fixed roof, with a maximum capacity of 2,236,916 gallons, and exhausting to vent 5501.
(16) One (1) kerosene storage tank, constructed in 1953, identified as 1001, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1001.
(17) One (1) kerosene storage tank, constructed in 1953, identified as 1002, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1002.
(18) One (1) kerosene storage tank, constructed in 1953, identified as 1004, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1004.
(19) One (1) kerosene storage tank, constructed in 1953, identified as 2005, with a vertical fixed roof, with a maximum capacity of 835,391 gallons, and exhausting to vent 2005.
(20) One (1) raffinate internal floating roof storage tank, identified as Tank 201 with a capacity of 84,000 gallons. This tank is currently not being used and was constructed before 1973.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, (Petroleum Liquid Storage Facilities), the source shall comply will the requirements for internal floating roofs or fixed roofs for the ~~eighteen~~ **nineteen** (1~~8~~ **19**) storage tanks identified as 2001, 2002, 2003, 2004, 4001, 4002, 4003, 1003, 1005, 1006, 2006, 2401, 3001, 5501, 1001, 1002, 1004, ~~and~~ 2005 **and Tank 201**.

D.1.4 Volatile Organic Compounds [326 IAC 2-8]

The potential to emit volatile organic compounds (VOCs) from the ~~eighteen~~ **nineteen** (1~~8~~ **19**) storage tanks and the loading racks shall be limited to less than 100 tons per year, rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permits) will not apply. The limits (based on throughput of petroleum products) shall be based on the following emission factors taken from the source's emission data:

One (1) million gallons of gas/ethanol = 16.41 tons of Volatile Organic Compound (VOC) emissions

One (1) million gallons of diesel = 1.86 tons of Volatile Organic Compound (VOC) emissions

One (1) million gallons of kerosene = 2.56 tons of Volatile Organic Compound (VOC) emissions

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
APD

cc: File - Henricks County
U.S. EPA, Region V
Henricks County Health Department
Air Compliance Section Inspector - Jim Thorpe
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR MANAGEMENT

Support Terminal Services dba ST Services
3350 N. Raceway Road
3218 N. Raceway Road
Indianapolis, Indiana 46234-0132

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F063-9219-00027	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: October 7, 1998

First Administrative Amendment 063-11406	Issuance Date: November 4, 1999
Second Administrative Amendment 063-12051	Issuance Date: July 20, 2000
First Minor Permit Modification 063-13607	Issuance Date: January 25, 2001

Third Administrative Amendment 063-16459	Pages Amended: 5, 25, 27
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: August 30, 2002

(8) One (1) truck loading rack, identified as NA01, with a maximum capacity of 40,000 gallons per hour, with VOC emissions controlled by a flare and exhausting to vent NA01.

(9) One (1) diesel storage tank, constructed in 1953, identified as 1003, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1003.

(10) One (1) diesel storage tank, constructed in 1953, identified as 1005, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1005.

(11) One (1) diesel storage tank, constructed in 1953, identified as 1006, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1006.

(12) One (1) diesel storage tank, constructed in 1953, identified as 2006, with an internal floating roof, with a maximum capacity of 853,020 gallons, and exhausting to vent 2006.

(13) One (1) diesel storage tank, constructed in 1953, identified as 2401, with an internal floating roof, with a maximum capacity of 1,015,182 gallons, and exhausting to vent 2401.

(14) One (1) diesel storage tank, constructed in 1953, identified as 3001, with a vertical fixed roof, with a maximum capacity of 1,353,196 gallons, and exhausting to vent 3001.

(15) One (1) diesel storage tank, constructed in 1953, identified as 5501, with a vertical fixed roof, with a maximum capacity of 2,236,916 gallons, and exhausting to vent 5501.

(16) One (1) kerosene storage tank, constructed in 1953, identified as 1001, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1001.

(17) One (1) kerosene storage tank, constructed in 1953, identified as 1002, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1002.

(18) One (1) kerosene storage tank, constructed in 1953, identified as 1004, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1004.

(19) One (1) kerosene storage tank, constructed in 1953, identified as 2005, with a vertical fixed roof, with a maximum capacity of 835,391 gallons, and exhausting to vent 2005.

(20) One (1) raffinate internal floating roof storage tank, identified as Tank 201 with a capacity of 84,000 gallons. This tank is currently not being used and was constructed before 1973.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) One (1) 15,000 gallon fixed roof tank storing ethanol and identified as tank 1.

(2) One (1) 15,000 gallon fixed roof tank storing ethanol and identified as tank 2.

(3) One (1) 15,000 gallon fixed roof tank storing ethanol and identified as tank 3.

(4) One (1) 15,000 gallon fixed roof tank storing ethanol and identified as tank 4.

(5) One (1) 7,400 gallon fixed roof tank storing additive and identified as tank A-1.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(1) One (1) gasoline storage tank, constructed in 1953, identified as 2001, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2001.
(2) One (1) gasoline storage tank, constructed in 1953, identified as 2002, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2002.
(3) One (1) gasoline storage tank, constructed in 1953, identified as 2003, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2003.
(4) One (1) gasoline storage tank, constructed in 1953, identified as 2004, with an internal floating roof, with a maximum capacity of 845,968 gallons, and exhausting to vent 2004.
(5) One (1) gasoline storage tank, constructed in 1953, identified as 4001, with an internal floating roof, with a maximum capacity of 1,680,000 gallons, and exhausting to vent 4001.
(6) One (1) gasoline storage tank, constructed in 1953, identified as 4002, with an internal floating roof, with a maximum capacity of 1,680,000 gallons, and exhausting to vent 4002.
(7) One (1) gasoline storage tank, constructed in 1953, identified as 4003, with an internal floating roof, with a maximum capacity of 1,680,000 gallons, and exhausting to vent 4003.
(8) One (1) truck loading rack, identified as NA01, with a maximum capacity of 40,000 gallons per hour, with VOC emissions controlled by a flare and exhausting to vent NA01.
(9) One (1) diesel storage tank, constructed in 1953, identified as 1003, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1003.
(10) One (1) diesel storage tank, constructed in 1953, identified as 1005, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1005.
(11) One (1) diesel storage tank, constructed in 1953, identified as 1006, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1006.
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(18) One (1) kerosene storage tank, constructed in 1953, identified as 1004, with a vertical fixed roof, with a maximum capacity of 441,860 gallons, and exhausting to vent 1004.
(19) One (1) kerosene storage tank, constructed in 1953, identified as 2005, with a vertical fixed roof, with a maximum capacity of 835,391 gallons, and exhausting to vent 2005.
(20) One (1) raffinate internal floating roof storage tank, identified as Tank 201 with a capacity of 84,000 gallons. This tank is currently not being used and was constructed before 1973.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-4-3]

Pursuant to 326 IAC 8-4-3, (Petroleum Liquid Storage Facilities), the source shall comply will the requirements for internal floating roofs or fixed roofs for the nineteen (19) storage tanks identified as 2001, 2002, 2003, 2004, 4001, 4002, 4003, 1003, 1005, 1006, 2006, 2401, 3001, 5501, 1001, 1002, 1004, 2005 and Tank 201.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Petroleum sources: bulk gasoline terminals):

D.1.4 Volatile Organic Compounds [326 IAC 2-8]

The potential to emit volatile organic compounds (VOCs) from the nineteen (19) storage tanks and the loading racks shall be limited to less than 100 tons per year, rolled on a monthly basis. Therefore, the requirements of 326 IAC 2-7 (Part 70 Permits) will not apply. The limits (based on throughput of petroleum products) shall be based on the following emission factors taken from the source's emission data:

One (1) million gallons of gas/ethanol = 16.41 tons of Volatile Organic Compound (VOC) emissions

One (1) million gallons of diesel = 1.86 tons of Volatile Organic Compound (VOC) emissions

One (1) million gallons of kerosene = 2.56 tons of Volatile Organic Compound (VOC) emissions

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the loading rack and its control device (NA01).

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]

During the period between 30 and 36 months after issuance of this permit, the Permittee shall perform inlet and outlet VOC testing of the vapor control system according to 326 IAC 3-6 (Source Sampling Procedures) using the methods specified in the rule or as approved by the commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.7 Monitoring [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

(a) The vapor control system shall operate at all times that the petroleum product loading rack is operated. The vapor control system shall be interfaced with the loading rack to prevent loading if the control system is not operational. An indicator light shall detect the presence of a pilot flame. This indicator shall be inspected once per business day, and the result shall be recorded.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

(a) To document compliance with D.1.1, the Permittee shall maintain records of the types and amounts of each volatile petroleum liquid stored, the maximum true vapor pressure of the liquid as stored, and the results of the inspections performed on the storage vessels. Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

(b) To document compliance with Condition D.1.4 and D.1.7, the Permittee shall maintain a log of flame indicator inspections and those additional inspections prescribed by the Preventive Maintenance Plan.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.